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February 15, 2000

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ORIGINAL

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
The Portals, Room TW-A325
445 12th Street, SW
Washington, DC 20554

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FEB 15 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

RE: Numbering Resource Optimization
 CC Docket No. 99-200

EX PARTE

Dear Ms. Salas:

This is to inform you that on February 14, 2000 Anna Miller, Art Morrison and Ben Almond, all of BellSouth Corporation met with members of the FCC's Common Carrier and Wireless Telecommunications Bureaus concerning the above mentioned subject. Representing the Common Carrier Bureau were Yog Varma and Cheryl Callahan and representing the Wireless Telecommunications Bureau were Blaise Scinto, John Spencer and Peter Wolfe.

The attached documents were used for discussion purposes. Please associate this notification and the accompanying material with the referenced docket proceeding.

If there are any questions concerning this matter, please contact the undersigned.

Sincerely,

Ben G. Almond

Ben G. Almond
Vice President-Federal Regulatory

Cc: Yog Varma
Cheryl Callahan
Blaise Scinto
John Spencer
Peter Wolfe

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Numbering Resource Optimization CC Docket No. 99-200

Ex Parte Presentation
BellSouth Corporation
February 14, 2000

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Overview

- *Commission's logic in LNP extension for wireless is still sound*
- *Wireless pooling prior to LNP is impractical and inappropriate*
- *Utilization thresholds are inappropriate*
- *Special overlays are not efficient solutions*
- *Strong national guidelines are needed for consistency and competitive neutrality*

Wireless LNP

➤ *Commission's logic in LNP extension for wireless is still sound*

- PCS network build outs are still underway
- To support nationwide roaming, significant roaming challenges must be addressed
- Given human and capital resource constraints, the Wireless Number Portability Timeline for Phase 2 is ambitious yet realistic
- BellSouth is diligently working on compliance with the FCC mandate to implement LNP
- November 24, 2002 is the earliest practical date for wireless LNP

Wireless Pooling

➤ *Wireless pooling prior to LNP is impractical and inappropriate*

- Wireless carriers efficiently use NXXs over multiple rate centers so that pooling for wireless is unnecessary
- Pooling before LNP is technically impossible because pooling uses the LNP architecture
- Significant problems exist with donation of numbers prior to pooling
- WNPSC investigation concluded that pooling before porting is not a viable approach for wireless
- Consuming resources to implement interim pooling would jeopardize compliance with the LNP implementation deadline

Wireless Utilization

➤ *Utilization thresholds are inappropriate*

- There are operational and competitive concerns that impact utilization
- Threshold levels must be reasonable and not degrade carriers' business viability
- No one threshold level can satisfy the business needs of all carriers
- Months to exhaust is a more efficient method of number conservation
- For monitoring purposes only, utilization by NPA is appropriate

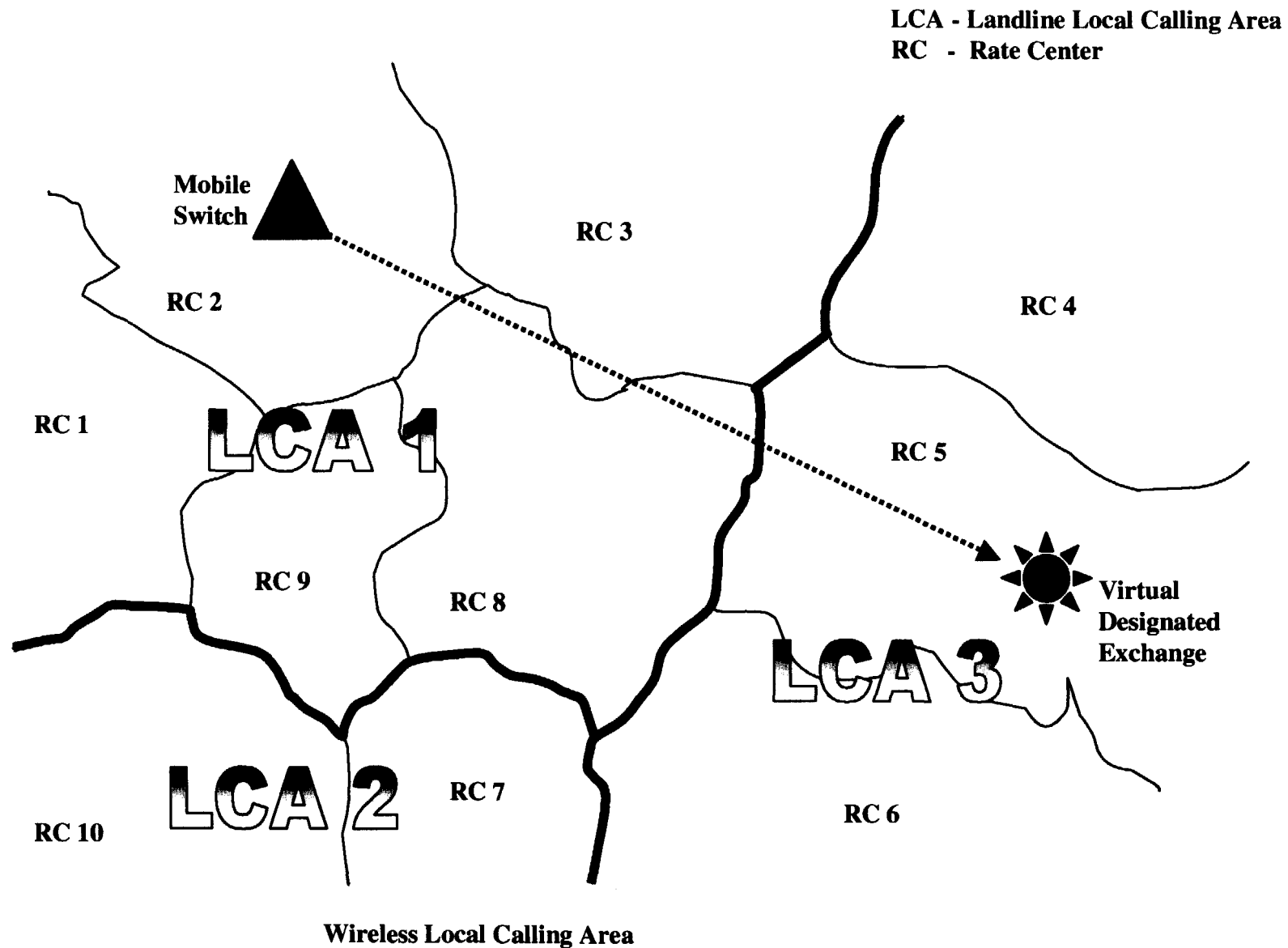
Special Overlays

- *Special overlays are not efficient solutions*
 - As the FCC has consistently observed, NPA relief plans must be competitively and technologically neutral
 - Wireless only 10 digit dialing is not competitively neutral
 - Overlays that require all carriers to utilize 10 digit dialing are efficient and non-discriminatory
 - Existing C. O. Code (NXX) Assignment Guidelines accommodate wireless demand for numbers

National Numbering Guidelines

➤ *Strong national guidelines are needed for consistency and competitive neutrality*

- The FCC must establish and enforce national guidelines
- The FCC must clearly define state authority over numbering
- State-by state implementation of pooling is inconsistent with inter-state nature of NPAC and operational conventions of wireline and wireless carriers
- Numbering Authority over and above that already granted by the FCC in addressing the individual state petitions is inappropriate



2/14/00

BellSouth Corporation (CC Docket 99-200)